

Page 1

1 - BENJAMIN WILSON -

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK4 ----- X
5 ULKU ROWE,

6 Plaintiff,

7 Case No.
8 19 Civ. 08655 (LGS) (GWG)

9 v.

10 GOOGLE LLC,

11 Defendant.

12 DATE: December 2, 2020

13 TIME: 10:21 a.m.

14 VIDEOTAPED VIDEOCONFERENCE DEPOSITION
15 OF BENJAMIN WILSON, held via Zoom, pursuant to
16 Notice, before Hope Menaker, a Shorthand Reporter
17 and Notary Public of the State of New York.

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<p style="text-align: center;">Page 158</p> <p>Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 160</p> <p>1 - BENJAMIN WILSON -</p> <p>2 February, but for the first six months or so I was</p> <p>3 doing project management work to solve an urgent</p> <p>4 business problem; and then in I would say August,</p> <p>5 mid-August, I started functioning in the product</p> <p>6 management role, just so we're precise.</p> <p>7 Q. And so as of February, who did you</p> <p>8 report to?</p> <p>9 A. Initially, well, Ros -- Roslyn</p> <p>10 Litchfield.</p> <p>11 Q. And what is Ms. Litchfield's</p> <p>12 position?</p> <p>13 A. Senior director of product</p> <p>14 management.</p> <p>15 Q. And as of August, who did you report</p> <p>16 to?</p> <p>17 A. Same person; Roslyn Litchfield.</p> <p>18 Q. And, currently, who do you report to?</p> <p>19 A. We just made an org change. I'm now</p> <p>20 reporting to Eric Watson.</p> <p>21 Q. And is Eric Watson also on the</p> <p>22 product management ladder?</p> <p>23 A. Yes, he is.</p> <p>24 Q. And is there a reason why your ladder</p> <p>25 hasn't changed product management?</p>
<p style="text-align: right;">Page 159</p> <p>1 - BENJAMIN WILSON -</p> <p>2 A. Yes.</p> <p>3 Q. Did the product management role</p> <p>4 require an understanding of the challenges modern</p> <p>5 enterprises faced with respect to scale, speed,</p> <p>6 and user expectations?</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. Yes.</p> <p>9 Q. When you moved into the product</p> <p>10 management role, did your level change?</p> <p>11 A. No.</p> <p>12 Q. What is your current level?</p> <p>13 A. I am still an L 9. My expectation is</p> <p>14 if I move into the product management role</p> <p>15 officially, I will be downgraded to an L 8.</p> <p>16 Q. So at this point in time, are you</p> <p>17 functioning in a product management position or</p> <p>18 are you functioning in the technical client lead</p> <p>19 position?</p> <p>20 A. Product management.</p> <p>21 Q. And how long have you been</p> <p>22 functioning in the product management position?</p> <p>23 A. Roughly six months.</p> <p>24 I -- I do need to provide a</p> <p>25 clarification to that. I started the role in</p>	<p style="text-align: right;">Page 161</p> <p>1 - BENJAMIN WILSON -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Inside Google moving to the product</p> <p>4 management ladder requires lot -- lots of</p> <p>5 evaluations. It's stated that it's like -- it's</p> <p>6 going through a brand-new interview like you were</p> <p>7 a new employee -- rather or a non-Google employee</p> <p>8 and you have to go through -- I've been asked to</p> <p>9 go through a year of evaluation in the product</p> <p>10 management role.</p> <p>11 Q. Have you been give -- given any</p> <p>12 indication about whether you will move over to the</p> <p>13 product management ladder?</p> <p>14 A. No, not yet.</p> <p>15 Q. Is it your understanding that your</p> <p>16 role and responsibilities will continue as they</p> <p>17 are presently are if and when you do move over to</p> <p>18 the product management ladder?</p> <p>19 A. Yes.</p> <p>20 Q. And I think you may have testified</p> <p>21 that your understanding is that if and when you</p> <p>22 move over to the product management ladder, your</p> <p>23 level at that time may change; is that right?</p> <p>24 A. Yes. I would go from an L 9 to an</p> <p>25 L 8 would be my expectation.</p>